

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

Kimberly Wright

Civil No. 1-18-bk-00373-HWV

Defendant(s)

Chapt.: 13

vs.

Lawrence V. Young, Esquire
CGA Law Firm; its Attorneys
135 North George Street
York, Pennsylvania 17401

Manchester Township

Plaintiff(s)

FILED
HARRISBURG, PA
2018 JUL -6 PM 2:09
CLERK
U.S. BANKRUPTCY COURT

CWP
ACK

OBJECTIONS OF DEFENDANT'S TO LIFT AUTOMATIC STAY; DEFENDANT
REQUEST DISMISSAL OF HEARING AND REQUEST MOTION TO STAY PROCEEDINGS

Defendant(s) Kimberly Wright, Pro Se, file this Objections to Lift Stay and/or Dismiss proceedings of Plaintiff's complaint and as grounds therefore state(s):

Re: July 10, 2018 Hearing

As Lawrence V. Young explained Manchester Township has reallocated Defendant's payments. Most recently received from Manchester Township is updated billing, invoiced dated 8/1/2018. Proof of Pre-Petition arrears showing the amount of \$23.60 overdue and the current Post-Petition claim of \$38.00 Trash and \$95.00 Sewer Treatment for a total \$156.60 Quarterly payment not due until 8/1/2018 received by mail to Defendant. legal insufficiency of a pleading (demurrer);matter under Rule 1030.

Request Objections to Honorable court to stay proceedings as the current Manchester Township Billing Summary shows pre-petition payments to be less than necessary to continue with hearing.

Per Plaintiff, see attached Current Exhibit of prior Balance verifiable by Plaintiff, Manchester Township, c/o Lawrence V. Young, Attorney.

Defendant's request for honorable court to to dismiss various fees and costs that have or may be entered as mentioned by Lawrence V. Young, attorney due to the omitted payments and verified by Manchester Township reallocation of billing charges. Plaintiff's Pre-Petition arrears \$23.60 is still disputed, but can be rectified with Manchester Township and will be paid by Defendant. 52 Pa. Code § 5.61.

Defendant's request the Honorable Judge to Dismiss Lift of Stay hearing. The Plaintiff's has located and placed misappropriated funds of the Defendant's toward Pre-Petition payments resulting in the final Pre-Petition amount of \$23.60 being due as a satisfaction of Pre-Petition debt, Defendant respectfully request motion to stay proceedings remain in affect.

Wherefore, your Defendant prays that his Honorable Court enter an Order to continue Stay and Objections to proceedings in the above-captioned case are applicable.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.


KIMBERLY WRIGHT, prose
2536 EASTON BLVD #122
YORK, PA 17402

Exhibit "Attached"

MANCHESTER TOWNSHIP

3200 FARMTRAIL ROAD, YORK, PA 17406-5699 717-764-4646

Name: WRIGHT, KIMBERLY Invoice Date: 07/01/2018
 Account Number: 4043018690 Premise #: 4954 Invoice Number: 684156
 Service Location: 1869 BRANDYWINE LN Payment Due Date: 08/01/2018

SERVICE / METER ID	PREVIOUS DATE READING	PRESENT DATE READING	CONSUMPTION	BILLING SUMMARY	
				PERIOD:	7/1/2018 - 9/30/2018
				Prior Balance, Payments and Adjustments Previous Balance 23.60 Payments 0.00 Adjustments/Credits Penalty 0.00 Current Charges TRASH 38.00 SEWER TREATMENT 95.00	
				AMOUNT DUE: BEFORE 8/1/2018 AFTER 8/1/2018 \$156.60 \$169.90	
3028 Please keep this portion for your records					

CORRECTED
PRE-
Relation
Balance

Messages:

Make Check Payable To: MANCHESTER TOWNSHIP SEWER

(No postdated checks will be accepted.)

at MANCHESTER TOWNSHIP
 3200 Farmtrail Road
 York, PA 17406-5699

IN PERSON - BY MAIL - USE DROP BOX
 on line at www.mantwp.com and click on "pay online"

Time and method of payments, discount and penalty provisions, are as prescribed by the Manchester Township Code of Ordinances

PLEASE NOTE: Failure to receive bill does not excuse non-payment or relinquish customer of late charges.

OFFICE HOURS

Monday - Friday
 8:00 am - 4:30 pm

PHONE:

717-764-4646

NOTICE:

Effective July 1, 2018, sewer treatment rates will be increased to \$95.00 per quarter. Trash collection will remain the same. There will no longer be a fee for garbage disposals. Metered customers will increase to \$2.96 / per 1,000 gpd.

Tear Here and Return with Payment — Tear Here and Return with Payment — Tear Here and Return with Payment — Tear Here and Return with Payment — Tear Here and Return with Payment

MANCHESTER TOWNSHIP

3200 Farmtrail Road
 York, PA 17406

Make Check Payable To: MANCHESTER TOWNSHIP SEWER



WRIGHT, KIMBERLY
 1869 BRANDYWINE LN
 YORK, PA, 17404

SEWER / TRASH BILL PAYMENT STUB

Premise	Please Pay
4954	\$156.60
Account Number	Amount Enclosed
4043018690	

Mail to: MANCHESTER TOWNSHIP
 3200 Farmtrail Road
 York, PA 17406-5699

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Certificate of Service

I hereby certify that a copy of was sent by first class mail, postage pre-paid, upon the following listed below:

NO.: 1-18-bk-00373-HWV

Lawrence V. Young, Esquire
CGA Law Firm, its Attorneys
135 North George Street
York, Pennsylvania 17401

Manchester Township

KIMBERLY WRIGHT, prose

2536 EASTON BLVD #122

YORK, PA 17402